EPA Region 5 Records Ctr.
276948

Final Report
Mercury Regulator Removal Action
Newtson Iron & Metal, Inc.
901 W. Marquette St.
Ottawa, Illinois

Prepared for:
Nicor Gas

March 2001

By:
James E. Huff, P.E.
Sarah Monette, P.E.
Lisa M. Paulson

HUFF & HUFF, INC.
ENVIRONMENTAL CONSULTANTS
LaGRANGE, ILLINOIS

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CERTIFICATION

Under penalty of law, I certify that, to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of this report, the information submitted is true, accurate and complete.

James E Huff — 3/24/2001
Signature — Date

James E. Huff, P.E.
Name

Vice President, Huff & Huff, Inc.
Title, Company

Sarah Monette — 03-23-01
Signature — Date

Sarah Monette, P.E.
Name

Sr. Project Engineer, Huff & Huff, Inc.
Title, Company

Lisa M Paulson — 3-23-01
Signature — Date

Lisa M. Paulson
Name

Environmental Scientist, Huff & Huff, Inc.
Title, Company

Richard Tappan — 3/23/01
Signature — Date

Richard Tappan
Name

Mgr. Environmental Affairs, Nicor Gas
Title, Company

1. INTRODUCTION

1.1 Report Overview

This document presents the "Final Report" for the Nicor Gas cleanup activities at the Newtson Iron & Metal Inc. scrap yard (hereafter called "Scrap Yard"). The cleanup activities included removal of mercury-type regulators and soil testing.

The work was performed in accordance with the requirements of the "Administrative Order Pursuant to Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, Docket No. VW-00-C-610," issued by the United States Environmental Protection Agency (U.S. EPA) in September 2000, and the U.S. EPA-approved "Remedial Action Work Plan," dated October 2000.

1.2 Site Location and Layout

The Scrap Yard is located at 901 W. Marquette Street in Ottawa, Illinois. Figure 1-1 depicts the site location and Figure 1-2 depicts the site layout, including the location where Nicor Gas scrap metal had been accumulated.

This scrap metal area was identified during a site inspection by the Illinois EPA and subsequently during a site walkover. Huff & Huff conducted the site walkover on September 28, 2000 with the site owner (Mr. Dan Szafranski), Illinois EPA, and U.S. EPA. The entire site was inspected, looking for regulators. The scrap pile area depicted on Figure 1-2 was identified by Mr. Szafranski as the only area where Nicor Gas scrap metal had been stored. This area was consistent with the site reconnaissance and was identified by Illinois EPA and U.S. EPA as the only area requiring a response under the 106(a) Order.

1.3 Personnel

Key personnel associated with this project are:

Mr. Steven Faryan	On-Scene Coordinator	U.S. EPA
Ms. Claudia Macholz	Project Manager	Nicor Gas
Mr. James E. Huff, P.E.	Project Coordinator	Huff & Huff
Mr. Perre Krizanek	Contractor	Heritage Environmental Services
Mr. Dan Szafranski	Site Owner	Newtson Iron & Metal

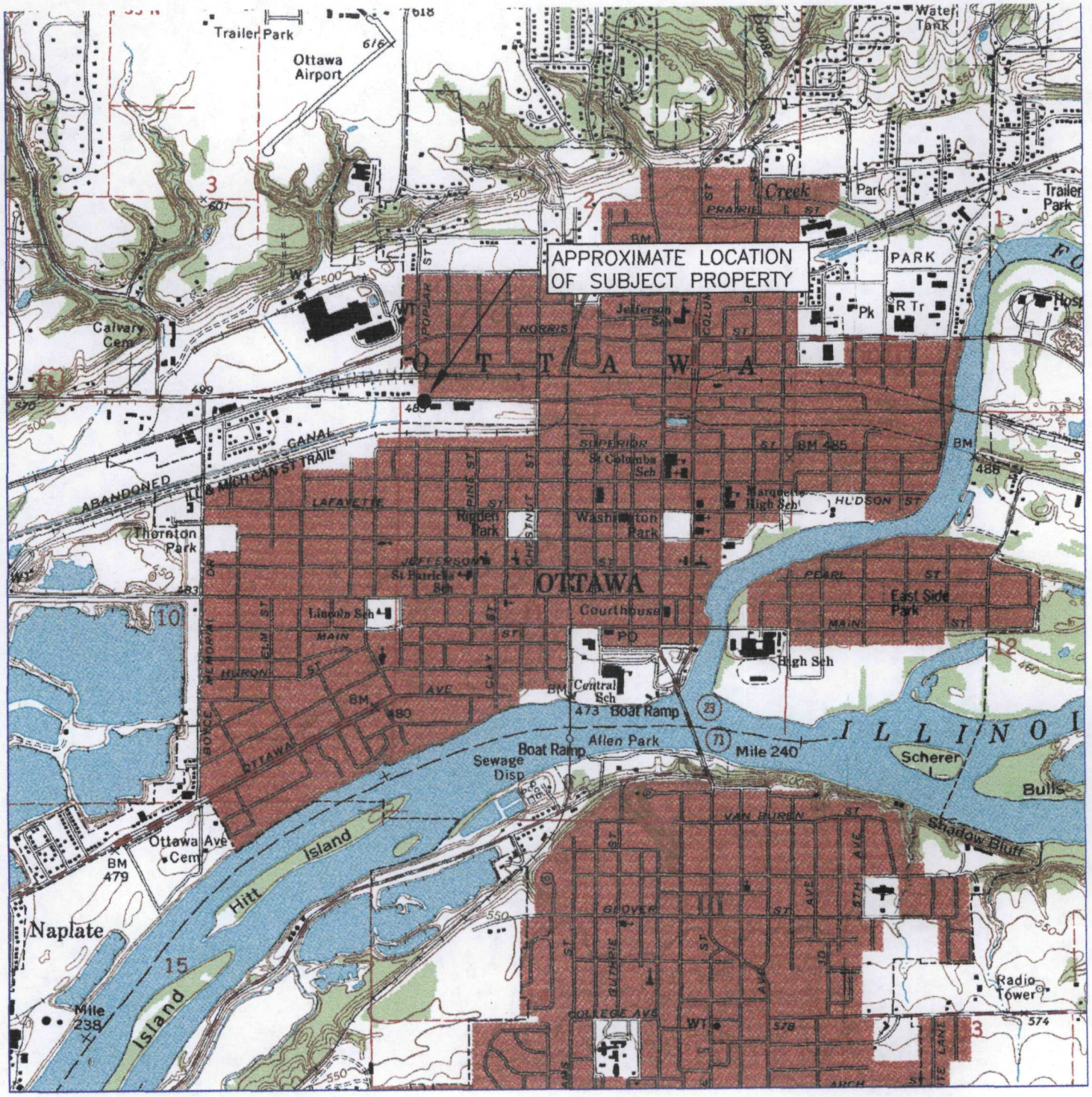

FIGURE 1–1
SITE LOCATION MAP
NEWTSON IRON & METAL INC.
OTTAWA, ILLINOIS

NORTH

2000' 0 2000'

SOURCE: UNITED STATES DEPARTMENT OF THE INTERIOR, GEOLOGICAL SURVEY
OTTAWA, ILLINOIS QUADRANGLE

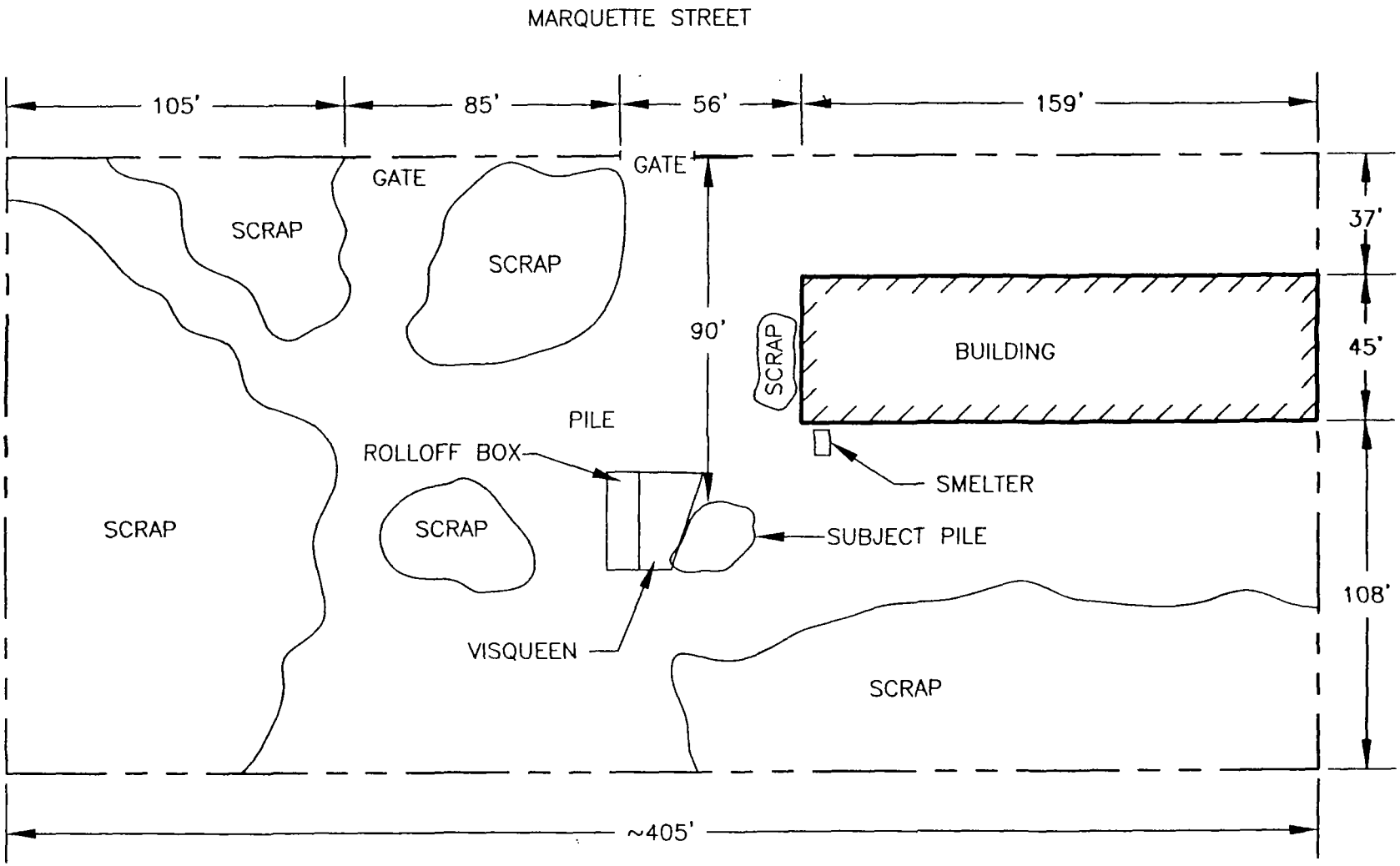

FIGURE 1-2
SITE LAYOUT MAP
NEWTSON IRON & METAL INC.
OTTAWA, ILLINOIS

NORTH

NOT TO SCALE

50' 0 50'

CADFILE: HG-OTTAWA

1.4 Schedule

The Section 106(a) Order was issued in September 2000. Work began at the Scrap Yard on October 20, 2000 and was complete by October 31, 2000. This time frame is in accordance with the U.S. EPA-approved schedule. (Work activities are detailed in Section 2.)

2. WORK ACTIVITIES

2.1 Overview

Work activities were performed in general compliance with the site work plan ("Removal Action Work Plan, October 2000"), as approved by U.S. EPA and Illinois EPA. Field changes to the approved site work plan were made as directed by the U.S. EPA On-Scene Coordinator.

Work activities included:

- scrap metal sorting (to segregate mercury-type regulators)
- soil sampling (to determine potential mercury impacts to underlying soil)
- material removal (mercury-type regulators, scrap metal, and debris)
- air monitoring (to assess mercury levels in ambient air)

Site photographs are presented in Appendix A. Waste manifests and shipping papers are presented in Appendix B. Steve Faryan, the U.S. EPA On-Scene Coordinator, was present throughout the above listed work activities, and provided approval of the appropriateness of the work performed at the site.

2.2 Material Sorting and Removal

Huff & Huff (James Huff, Lisa Paulson, and Jose Gonzalez) mobilized to the site on October 20, 2000, with the contractor, Heritage Environmental Services. The U.S. EPA On-Scene Coordinator, Steve Faryan, was present, along with the U.S. EPA contractor, Ecology & Environment. Ecology & Environment provided a Lumex Meter for mercury vapor monitoring. Sorting and removal of the Nicor scrap began at 9:30 AM, and was complete by 11:15 AM.

The following table summarizes the material removed from the site, the classification of each waste stream, and the destination to which it was sent.

Material	Quantity	Waste Type	Destination
Mercury-Type Regulators	4 Regulators	High-Level Hg Hazardous Waste	To Superior Special Services Via Heritage (Lemont)
Scrap Metal, Personal Protective Equip.(PPE) and Debris	1 Roll-Off Box	Non-Hazardous Waste	To Newton County Landfill

2.3 Soil Sampling and Excavation

2.3.1 Screening and Sampling Locations

Soil beneath the identified scrap pile was evaluated after all scrap metal was removed. The evaluation included screening for mercury vapor with a Lumex Mercury Vapor Analyzer (Lumex Meter) and laboratory analysis of mercury (total and TCLP).

The area was divided into a grid of 10 feet by 10 feet squares, as depicted on Figure 2-1. Soils at each grid point were screened with the Lumex Meter (closed-cup headspace method). All grid points achieved readings of 0.010 mg/cu m mercury or less. Table 2-1 presents the Lumex Meter readings.

In addition, soil samples were collected for laboratory analysis. One soil sample was collected from each row of the grid. The sample was collected from the grid point having the highest Lumex Meter reading in the row (see Table 2-1). This selection method helped to assure evaluation of the area of greatest potential impact.

The selected soil samples were analyzed for mercury (total and TCLP) and pH at Test America Laboratories in Bartlett, Illinois. The total mercury results range from 10.7 mg/kg to 24.5 mg/kg. No TCLP mercury was detected. Copies of the laboratory analytical reports are provided in Appendix C.

2.3.2 Soil Sampling Results

Tables 2-2 through 2-4 present the soil sample results in comparison to the approved cleanup objectives. These objectives are the most conservative Illinois "Tier 1" cleanup objectives for industrial/commercial properties (including construction worker exposure). Each of the three Tier 1 exposure pathways is considered: soil component of groundwater ingestion, soil ingestion, and inhalation.

- Soil Component of Groundwater Ingestion (Class I)

  The Tier 1 objective for the soil component of Class I groundwater ingestion pathway is 0.002 mg/L TCLP mercury. TCLP mercury was not detected in any sample; all results were less than 0.0002 mg/L (see Table 2-2).

- Soil Ingestion

  The Tier 1 objective for the soil ingestion pathway is 610 mg/kg total mercury for industrial/commercial exposure and 61 mg/kg for construction worker exposure. All sample results achieved the objectives; the highest result was 24.5 mg/kg at D2 (see Table 2-3).

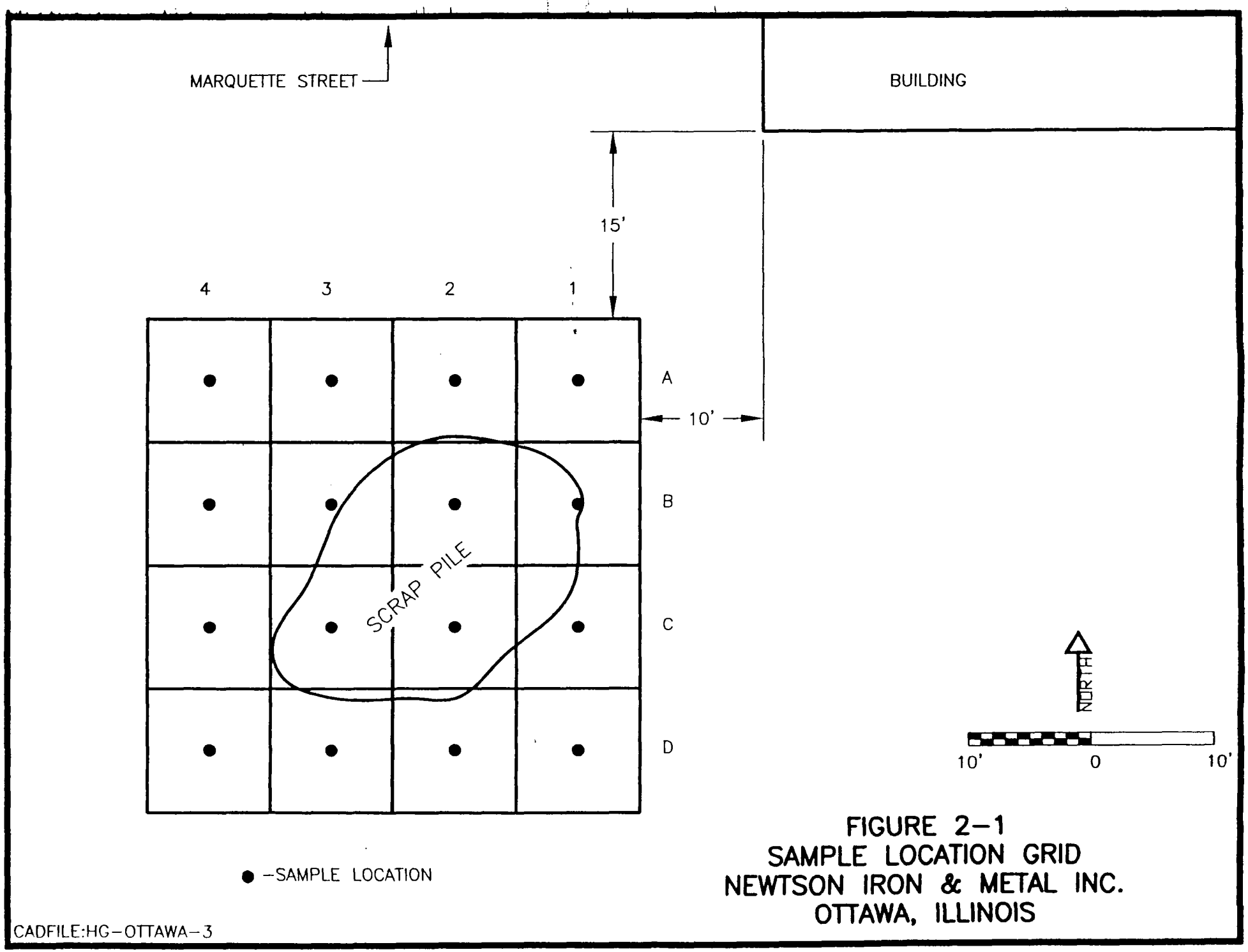

FIGURE 2–1
SAMPLE LOCATION GRID
NEWTSON IRON & METAL INC.
OTTAWA, ILLINOIS

CADFILE:HG–OTTAWA–3

TABLE 2-1
NEWTSON IRON & METAL INC.
SOIL HEADSPACE LUMEX METER READINGS [a/]

Location	Depth inches, bgs	Hg Reading mg/m^3
A1	0-6	0.00016
A2	**0-6**	**0.00016** [b/]
A3	0-6	0.00010
A4	0-6	0.00008
B1	0-6	0.00010
B2	0-6	0.00010
B3	0-6	0.00010
B4	**0-6**	**0.00014** [b/]
C1	0-6	0.00074
C2	0-6	0.00042
C3	**0-6**	**0.00086** [b/]
C4	0-6	0.00048
D1	0-6	0.00009
D2	**0-6**	**0.00014** [b/]
D3	0-6	0.00010
D4	0-6	0.00010

a/ Samples placed in zip locked baggies, half full, and the head space mercury vapor reading was collected after 15 minutes.

b/ Sample submitted to laboratory for mercury analysis.

C:\1DOC\Nicor\Mercury\Ottawa\[Lumex Readings.xls]Sheet1

TABLE 2-2
NEWTSON IRON & METAL, INC.

TIER 1 COMPARISON: SOIL COMPONENT of GROUNDWATER INGESTION

Location	Date	Depth, inches bgs	TCLP Hg, mg/L
Tier 1 Objective			0.0020
A2	10/20/00	0-6	<0.0002
B4	10/20/00	0-6	<0.0002
C3	10/20/00	0-6	<0.0002
D2	10/20/00	0-6	<0.0002

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TABLE 2-3
NEWTSON IRON & METAL, INC.

TIER 1 COMPARISON: SOIL INGESTION

Location	Date	Depth, inches bgs	Total Hg, mg/kg
Tier 1 Objective			
Ind/Comm			610.0
Constr. Wrk			61.0
A2	10/20/00	0-6	10.7
B4	10/20/00	0-6	14.3
C3	10/20/00	0-6	21.1
D2	10/20/00	0-6	24.5

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- Inhalation

  The Tier 1 objective for the inhalation pathway is 540,000 mg/kg for industrial/commercial exposure and 52,000 mg/kg for construction worker exposure. All sample results achieve the objectives; the highest result was 24.5 mg/kg at D2 (see Table 2-4).

Based upon these confirmation sample results, all soils achieve the applicable Tier 1 cleanup objectives for industrial/commercial properties and construction worker exposure.

2.4 Air Monitoring

A Lumex Meter was used to monitor mercury vapors in the work zone as well as around the perimeter of the work area. The following readings were recorded.

Date 10/20/00

Time	Location	Hg Vapor, mg/cu m (nanograms/cu m)
9:30	Work Zone	0.000019 (19)
9:35	North property line (wind from the south)	0.000007 (7)
9:38	West end of scrap yard	0.000008 (8)
9:41	South side of site	0.000007 (7)
9:45	East side of site	0.000014 (14)
10:00	Work Zone	0.000020 (20)

Based on the low mercury vapor readings in the work zone, the scrap segregation was conducted in Level D PPE. Sorting of the scrap was completed by 11:15 AM.

TABLE 2-4
NEWTSON IRON & METAL INC.

TIER 1 COMPARISON: INHALATION

Location	Date	Depth, inches bgs	Total Hg, mg/kg
Tier 1 Objective			
Ind/Comm			540,000.0
Constr. Wrk			52,000.0
A2	10/20/00	0-6	10.7
B4	10/20/00	0-6	14.3
C3	10/20/00	0-6	21.1
D2	10/20/00	0-6	24.5

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3. COSTS

The Section 106(a) Order requires that Nicor Gas prepare a good faith estimate of the total costs incurred in complying with the Order. Nicor Gas estimates that approximately $14,644 has been spent for closure of the Ottawa (Newtson) Scrap Yard.

The cost breakdown is as follows:

Engineering Oversite (including report preparation)	$ 6,795
Contractor (Heritage)	$ 4,956[a]
Analytical	$ 660
Waste Transportation and Disposal	
Hazardous Waste	$ 600[b]
Non-Hazardous Waste	$ 1,633

[a] Costs through 12/31/01.

[b] Estimated value based upon 4 regulators @ $25/regulator + $500 pickup and handling.

APPENDIX A

Ottawa scrap yard facing S.E.

Ottawa scrap yard facing S.W.

Ottawa scrap yard facing south.

Ottawa - subject pile - looking east.

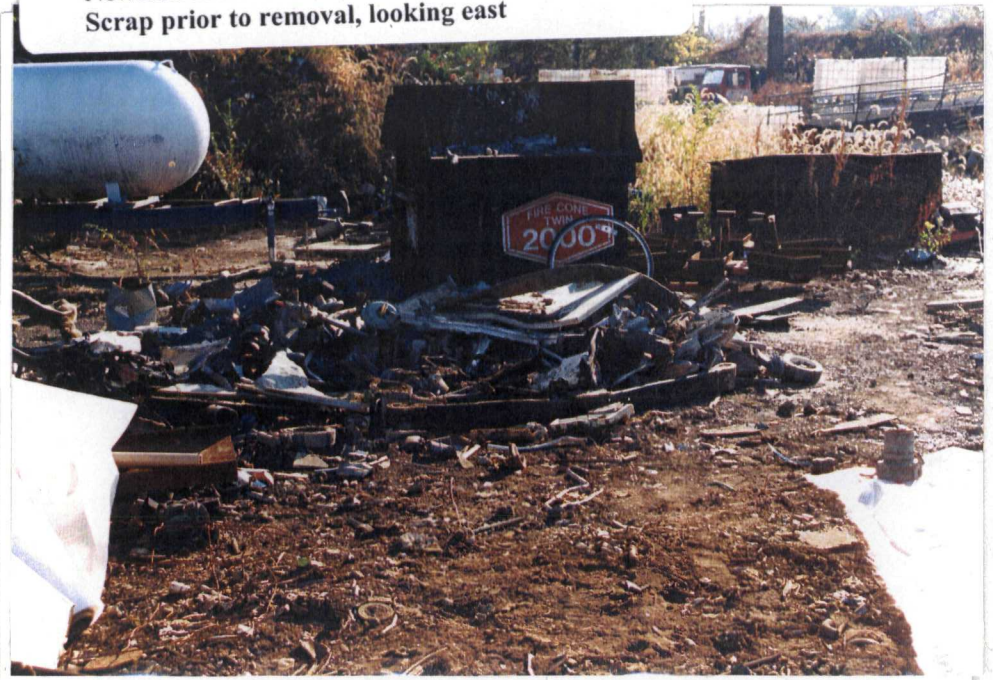
NICOR
OTTAWA, ILLINOIS
SEPTEMBER 28, 2000

CADFILE: OctMercP

Newtson Iron & Metal 10/20/00
Front of Building

Newtson Iron & Metal 10/20/00
Scrap pile before removal, looking NW

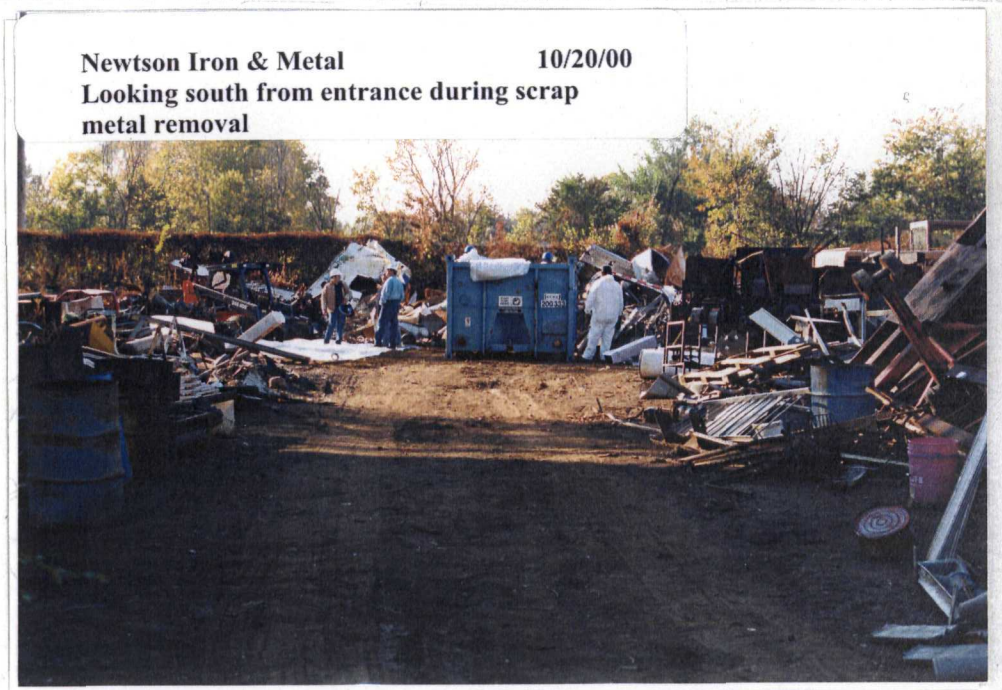
Newtson Iron & Metal 10/20/00
Smelter, looking NW



Newtson Iron & Metal 10/20/00
Scrap prior to removal, looking east

Newtson Iron & Metal 10/20/00
Four Hg-type regulators found

Newtson Iron & Metal 10/20/00
Looking south from entrance during scrap metal removal

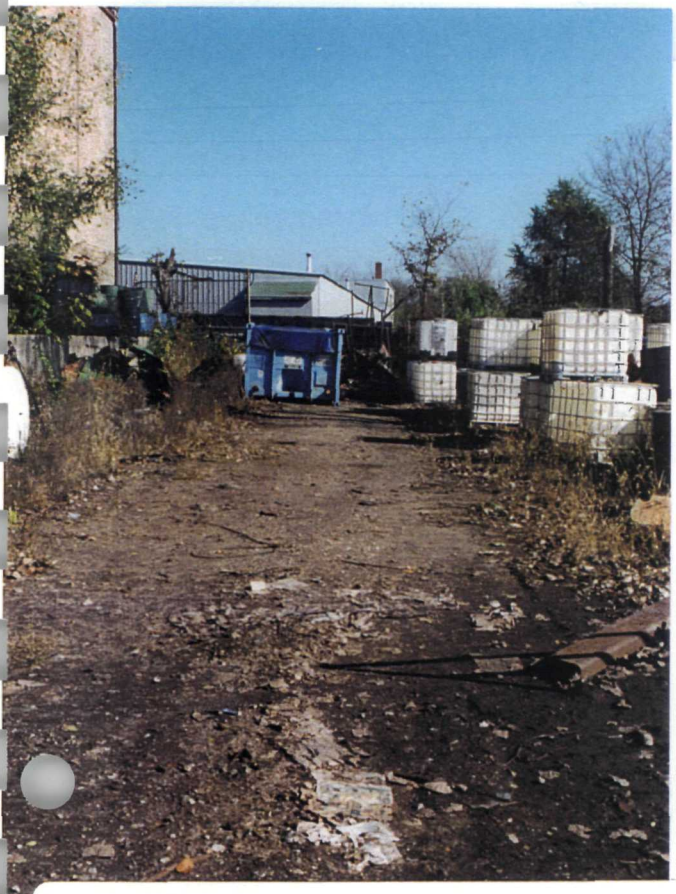


Newtson Iron & Metal 10/20/00
Area after scrap removal, looking SE

Newtson Iron & Metal 10/20/00
Soil sampling activities after scrap removal, looking south

Newtson Iron & Metal 10/27/00
Setting up to sort Ottawa Reporting Center Scrap

Newtson Iron & Metal 10/27/00
Closeup of Ottawa Reporting Center Scrap



Newtson Iron & Metal 10/27/00
Looking East where Rolloff Box stored (Scrap from Ottawa behind rolloff

APPENDIX B

02/26/2001 14:02 FAX 1 630 983 4345 ENVIR. SERVICES → HUFF HUFF 003
02/26/2001 10:16 FAX 1 630 739 9491 HERITAGE ENV. SVC. LLC 003

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE

State Form LPC 62 8/81 IL532-0610

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.) EPA Form 8700-22 (Rev. 6-89) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ILD113823850 Manifest Document No. 12482
2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but is required by Illinois law.

A. Illinois Manifest Document Number IL 9312482 FEE PAID IF APPLICABLE

3. Generator's Name and Mailing Address: Nicor, 1844 Ferry Rd. Naperville, Il 60540
Location If Different: 901 W. Marquette St. Ottawa, Il

B. Generator's IL ID Number 0990800024

4. 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS 800-827-5221

5. Transporter 1 Company Name: Heritage Transport LLC-HRVE
6. US EPA ID Number: IND058484114

C. Transporter's IL ID Number [illegible]
D. Transporter's Phone (317) 381-6848

7. Transporter 2 Company Name
8. US EPA ID Number

E. Transporter's ID Number
F. Transporter's Phone

9. Designated Facility Name and Site Address: Heritage Environmental Services LLC, 15330 Canal Bank Road, Lemont, Il. 60439
10. US EPA ID Number: ILD085349264

G. Facility's IL ID Number 0311620007
H. Facility's Phone (630) 739-1151

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, Hazardous Waste, Solid, N.O.S., 9, NA3077, PGIII, (High mercury Debris) (D009) ERG#171	001	CF	00001	Y	EPA HW Number D009; 000268
b.					EPA HW Number
c.					EPA HW Number
d.					EPA HW Number

J. Additional Descriptions for Materials Listed Above: A-1 CY Box

K. Handling Codes for Wastes Listed Above in Item #14

15. Special Handling Instructions and Additional Information
24 HR. Emergency Phone Number 1-800-48-SPill (Infotrack)

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Greg R. Cockream As Agent for Nicor — Signature: [signature] — Date Month Day Year: 02 22 01

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Greg R. Cockream — Signature: [signature] — Date Month Day Year: 02 22 01

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Michael Schultz — Signature: [signature] — Date Month Day Year: 02 23 01

GENERATOR / TRANSPORTER / FACILITY

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

In case of a spill call the Illinois Office of Emergency Response at 217/782-7860 and the National Response Center at 800/424-8802 or 202/426-2675.

OZINGA
TRANSPORTATION SYSTEMS, INC.

21900 South Central Ave.
Matteson, IL 60443
(708) 720-6000

E 533828

Date 10-31-00

Delivery Date 10-31-00

Ship To: Newton Cg. Development
Brook, In

Shipper: Nicor OTTAWA RTG Center P.O. No. 14062

	WEIGHT(lb)	PRODUCT DESCRIPTION	C.O.D.	AMOUNT
LOAD		LD Rain for Rent Box	Price	
EMPTY		Dump Rental #200333	Tax	
NET			Total	

SOURCE	ADDRESS	TICKET NO.
Nicor	Ottawa, IL	E533828

HOURLY

PORTAL TO PORTAL	TIME	LOCATION
Start		
Finish		
Total		

MANIFEST NUMBER: 09908000211

OTSI LINER? Y N

HOW MANY? _____

ROLL OFF BOX NUMBERS

DROPPED AT CUSTOMER Rain for Rent Box

PICKED UP AT CUSTOMER 200333

COMMENTS
P/u LD Rain for Rent Box To Del To Newton Landfill

LOAD TIMES

	1	2	3	4	5
Arrive	0906				
Begin Load	0915				
End Load	0945				
Depart	1000				
Total	1.0				

REQUESTED TIME | REASON FOR DELAY

LOADER SIGNATURE

DRIVER SIGNATURE

TRUCK #	OTSI TRAILER
728	9306

UNLOAD TIMES

	1	2	3	4	5
Arrive					
Begin Unload					
End Unload					
Depart					
Total					

REQUESTED TIME | REASON FOR DELAY

RECEIVER SIGNATURE

DRIVER SIGNATURE | TRUCK # | OTSI TRAILER

CUSTOMER COPY

ALTERNATE STRAIGHT BILL OF LADING—SHORT FORM

Shipper No. 09908000024

Memorandum Copy

Carrier No.

OZINGA TRANSPORTATION
(Name of Carrier)

Date 10·31·00

TO: Consignee NENTON CO. DEVELOPMENT	FROM: Shipper NICOR OTTAWA RPTB CENTER
Street 2266 E. 500 SOUTH RD.	Street 1629 CHAMPLAIN ST
Destination BROOK IN Zip Code 47922	Origin OTTAWA IL Zip Code 61350
Route:	Vehicle No.

No. Shipping Units	Kind of Packaging, Description of Articles Special Marks and Exceptions	Weight (Subject to Correction)	RATE	CHARGES
1	ROLL-OFF BOX SCRAP METAL			
	NON-HAZARDOUS BY DOT			
	TRUCK # 128 TRL 9306			
	B/L # 100333			
	WGT = 10,000 (LB)			

REMIT C.O.D. TO: ADDRESS	COD Amt: $	C.O.D. FEE: PREPAID ☐ COLLECT ☐ $	TOTAL CHARGES: $

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement.
The carrier shall not make delivery of this shipment without payment of freight and all other charges
_____
(Signature of Consignor)

FREIGHT CHARGES
Check Appropriate Box:
☐ Freight prepaid ☐ Collect

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of the shipment

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER NICOR GAS	CARRIER OZINGA
PER [signature]	PER [signature] DATE 10-31-00

TOPS FORM No. 38411

Made in U.S.A.

3

APPENDIX C

1/1

TestAmerica INCORPORATED

Bartlett Division
850 West Bartlett Road
Bartlett, IL 60103

Phone: 630-289-3100
Fax: 630-289-5445

To assist us in using the proper analytical methods, is this work being conducted for regulatory purposes?
Compliance Monitoring _____

Client Name: HUFF & HUFF, INC. Client #: _____
Address: 512 W BURLINGTON
City/State/Zip Code: LAGRANGE, IL 60525
Project Manager: LISA PAULSON
Telephone Number: 708-579-5972 Fax: _____
Sampler Name: (Print Name) JOSE GONZALEZ James E. Huff
Sampler Signature: [signature] [signature]

Project Name: NICOR NEWTSON
Project #: _____
Site/Location ID: OTTAWA State: IL
Report To: LISA PAULSON
Invoice To: Lisa Paulson
Quote #: _____ PO#: 16412

TAT: ___ Standard; √ Rush (surcharges may apply)
Date Needed: 10-25
Fax Results: (Y) N

QC Deliverables: ___ None; ___ Level 2; ___ Level 3 (Batch QC); √ Level 4; Other: _____

SAMPLE ID	Date Sampled	Time Sampled	G = Grab, C = Composite	Field Filtered	Matrix: SL - Sludge DW - Drinking Water; GW - Groundwater S - Soil/Solid; WW - Wastewater Specify Other	Preservation & # of Containers: HNO_3	HCl	NaOH	H_2SO_4	Methanol	None	Other (Specify)	Analyze For: Total Hg 7470A	TCLP Hg 7470A	pH	Percent Moisture	QC Deliverables	REMARKS
A2 (1)	10/20		C		S								X	X	X	X		
B4 (1)			C		S								X	X	X	X		
C4 (1)			C		S								X	X	X	X		
D2 (1)			C		S													
DUPLICATE (3) (2)					S								X					
1-FIELD BLANK					DI H2O WATER	X							X					
1-TRIP BLANK						X							X					

Special Instructions:

LABORATORY COMMENTS:
Init Lab Temp: 6°C
Rec Lab Temp: Blue Ice
Custody Seals: Y N (N/A)
Bottles Supplied by TestAmerica: (Y) N
Method of Shipment: T/A

Relinquished By: James E Huff	Date: 10/23/00	Time: 1:40	Received By: [signature]	Date: 10/23/00	Time: 1:40
Relinquished By: [signature]	Date: 10/23/00	Time: 1:40	Received By: Jon Beyer	Date: 10/23	Time: 1540
Relinquished By:	Date:	Time:	Received By:	Date:	Time:

TestAmerica
INCORPORATED

Ms. Lisa Paulson
HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525

10/30/2000

Job Number: 00.11747

IEPA Cert. No.: 100221
WDNR Cert. No.: 999447130

Enclosed is the Analytical and Quality Control reports for the following samples submitted to Bartlett Division of TestAmerica for analysis.

Project Description: Nicor Newtson; Ottawa, IL.

Sample Number	Sample Description	Date Taken	Date Received
603536	A2 (4)	10/20/2000	10/23/2000
603537	B4 (4)	10/20/2000	10/23/2000
603538	C3 (4)	10/20/2000	10/23/2000
603539	D2 (4)	10/20/2000	10/23/2000
603540	Duplicate (C3) (2)	10/20/2000	10/23/2000
603541	1-Field Blank	10/20/2000	10/23/2000
603542	1-Trip Blank	10/20/2000	10/23/2000

Sample analysis in support of the project referenced above has been completed and results are presented on the following pages. These results apply only to the samples analyzed. Reproduction of this report only in whole is permitted. Please refer to the enclosed "Key to Abbreviations" for definition of terms. Procedures used follow TestAmerica Standard Operating Procedures which reference the methods listed on your report. Should you have questions regarding procedures or results, please do not hesitate to call. TestAmerica has been pleased to provide these analytical services for you.

This Quality Control report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

Approved by:

Project Manager

850 W. Bartlett Rd. / Bartlett, IL 60103-4400 / 630-289-3100 / Fax: 630-289-5445 / 800-378-5700

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ANALYTICAL REPORT

Ms. Lisa Paulson
HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525

10/30/2000

Sample No. : 603536

Job No.: 00.11747

Sample Description: A2 (4)
Nicor Newtson; Ottawa, IL.

Date Taken: 10/20/2000
Time Taken:
IEPA Cert. No. 100221

Date Received: 10/23/2000
Time Received: 15:40
WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
pH, Non-Aqueous	8.56		units	10/25/2000	0.10	kmt	432	SW 9045B
Solids, Total	93.6		%	10/25/2000	0.1	kmt	3785	SM 2540
TCLP Metals Extraction	Leached			10/25/2000		kkp	1300	SW 1311
Mercury, CVAA	10.7		mg/kg dw	10/25/2000	0.043	efw2	887 1003	SW 7471A
TCLP-Mercury, CVAA	<0.0002		mg/L	10/26/2000	0.0002	efw2	1623 1464	SW 7470A

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ANALYTICAL REPORT

Ms. Lisa Paulson
HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525

10/30/2000

Sample No. : 603537

Job No.: 00.11747

Sample Description: B4 (4)
Nicor Newtson; Ottawa, IL.

Date Taken: 10/20/2000
Time Taken:
IEPA Cert. No. 100221

Date Received: 10/23/2000
Time Received: 15:40
WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
pH, Non-Aqueous	8.38		units	10/25/2000	0.10	kmt	432	SW 9045B
Solids, Total	90.9		%	10/25/2000	0.1	kmt	3785	SM 2540
TCLP Metals Extraction	Leached			10/25/2000		kkp	1300	SW 1311
Mercury, CVAA	14.3		mg/kg dw	10/25/2000	0.044	efw2	887 1003	SW 7471A
TCLP-Mercury, CVAA	<0.0002		mg/L	10/26/2000	0.0002	efw2	1623 1464	SW 7470A

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ANALYTICAL REPORT

Ms. Lisa Paulson
HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525

10/30/2000

Sample No. : 603538

Job No.: 00.11747

Sample Description: C3 (4)
Nicor Newtson; Ottawa, IL.

Date Taken: 10/20/2000
Time Taken:
IEPA Cert. No. 100221

Date Received: 10/23/2000
Time Received: 15:40
WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
pH, Non-Aqueous	8.05		units	10/25/2000	0.10	kmt	432	SW 9045B
Solids, Total	85.3		%	10/25/2000	0.1	kmt	3785	SM 2540
TCLP Metals Extraction	Leached			10/25/2000		kkp	1300	SW 1311
Mercury, CVAA	21.1		mg/kg dw	10/25/2000	0.047	efw2	887 1003	SW 7471A
TCLP-Mercury, CVAA	<0.0002		mg/L	10/26/2000	0.0002	efw2	1623 1464	SW 7470A

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ANALYTICAL REPORT

Ms. Lisa Paulson
HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525

10/30/2000

Sample No. : 603539

Job No.: 00.11747

Sample Description: D2 (4)
Nicor Newtson; Ottawa, IL.

Date Taken: 10/20/2000
Time Taken:
IEPA Cert. No. 100221

Date Received: 10/23/2000
Time Received: 15:40
WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
pH, Non-Aqueous	8.24		units	10/25/2000	0.10	kmt	432	SW 9045B
Solids, Total	89.9		%	10/25/2000	0.1	kmt	3785	SM 2540
TCLP Metals Extraction	Leached			10/25/2000		kkp	1300	SW 1311
Mercury, CVAA	24.5		mg/kg dw	10/25/2000	0.044	efw2	887 1003	SW 7471A
TCLP-Mercury, CVAA	<0.0002		mg/L	10/26/2000	0.0002	efw2	1623 1464	SW 7470A

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ANALYTICAL REPORT

Ms. Lisa Paulson
HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525

10/30/2000

Sample No. : 603540

Job No.: 00.11747

Sample Description: Duplicate (C3) (2)
Nicor Newtson; Ottawa, IL.

Date Taken: 10/20/2000
Time Taken:
IEPA Cert. No. 100221

Date Received: 10/23/2000
Time Received: 15:40
WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
Solids, Total	87.5		%	10/25/2000	0.1	kmt	3785	SM 2540
Mercury, CVAA	29.7		mg/kg dw	10/25/2000	0.046	efw2	887 1003	SW 7471A

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ANALYTICAL REPORT

Ms. Lisa Paulson
HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525

10/30/2000

Sample No. : 603541

Job No.: 00.11747

Sample Description: 1-Field Blank
Nicor Newtson; Ottawa, IL.

Date Taken: 10/20/2000
Time Taken:
IEPA Cert. No. 100221

Date Received: 10/23/2000
Time Received: 15:40
WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
Mercury, CVAA	<0.0002		mg/L	10/26/2000	0.0002	efw2	1623 1464	SW 7470A

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ANALYTICAL REPORT

Ms. Lisa Paulson
HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525

10/30/2000

Sample No. : 603542

Job No.: 00.11747

Sample Description: 1-Trip Blank
Nicor Newtson; Ottawa, IL.

Date Taken: 10/20/2000
Time Taken:
IEPA Cert. No. 100221

Date Received: 10/23/2000
Time Received: 15:40
WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
Mercury, CVAA	<0.0002		mg/L	10/26/2000	0.0002	efw2	1623 1464	SW 7470A

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QUALITY CONTROL REPORT

CONTINUING CALIBRATION VERIFICATION

HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525
Ms. Lisa Paulson

10/30/2000

Job Number: 00.11747

Analyte	Run Batch Number	CCV True Conc.	Conc. Found	Percent Recovery
pH, Non-Aqueous	432	7.00	7.05	100.7
pH, Non-Aqueous	432	7.00	7.04	100.6
Mercury, CVAA	1464	0.0025	0.00248	99.2
Mercury, CVAA	1003	0.00250	0.00236	94.4

CCV - Continuing Calibration Verification

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QUALITY CONTROL REPORT

BLANK ANALYSIS

HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525
Ms. Lisa Paulson

10/30/2000

Job Number: 00.11747

Analyte	Prep Batch Number	Run Batch Number	Blank Analysis Results	Units	Reporting Limit	Analytical Method
Solids, Total		3785	<0.1	%	0.1	SM 2540
Mercury, CVAA	1623	1464	<0.0002	mg/L	0.0002	SW 7470A
TCLP Metals Extraction		1300	Leached			SW 1311
Mercury, CVAA	887	1003	<0.040	mg/Kg	0.040	SW 7471A

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QUALITY CONTROL REPORT

LABORATORY CONTROL STANDARD

HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525
Ms. Lisa Paulson

10/30/2000

Job Number: 00.11747

Analyte	Prep Batch Number	Run Batch Number	True Conc.	Conc. Found	LCS % Recovery
Mercury, CVAA	1623	1464	0.0025	0.00257	102.8
Mercury, CVAA	887	1003	0.00250	0.00237	94.8

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QUALITY CONTROL REPORT

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525
Ms. Lisa Paulson

10/30/2000

Job Number: 00.11747

Analyte	Prep Batch Number	Run Batch Number	Matrix Spike Result	Sample Result	Spike Amount	Units	Percent Recovery	MSD Result	MSD Spike Amount	Units	Percent Recovery	MS/MSD RPD
Mercury, CVAA	1623	1464	0.00259	<0.0002	0.0025	mg/L	103.6	0.0025	0.0025	mg/L	102.0	1.6
Mercury, CVAA	887	1003	0.639	0.32	0.35	mg/kg	91.1	0.739	0.40	mg/kg	104.8	14.5
Mercury, CVAA	887	1003	0.416	<0.040	0.38	mg/kg	109.5	0.442	0.41	mg/kg	107.8	6.1

NOTE: Matrix Spike Samples may not be samples from this job.

For Inorganic Parameters and GC Volatiles, the spike recovery should be 75 - 125% if the spike added value was greater than or equal to one fourth of the sample result value. If not, the control limits are not established. The RPD for the MS/MSD pair should be less than 20.

MS = Matrix Spike
MSD = Matrix Spike Duplicate
RPD = Relative Percent Difference

RPD calculations are performed on the Percent Recovery calculated from the observed Matrix spike and Matrix Spike Duplicate results.

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QUALITY CONTROL REPORT

DUPLICATES

HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525
Ms. Lisa Paulson

10/30/2000

Job Number: 00.11747

Analyte	Prep Batch Number	Run Batch Number	Original Analysis	Duplicate Analysis	Units	RPD
pH, Non-Aqueous		432	8.24	8.22	units	0.2
Solids, Total		3785	83.3	82.5	%	1.0

NOTE: Spikes and Duplicates may not be samples from this job.

RPD - Relative Percent Difference

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Ms. Lisa Paulson
HUFF & HUFF INC.
512 West Burlington
Suite 100
LaGrange, IL 60525

10/30/2000

Job Number: 00.11747

IEPA Cert. No.: 100221
WDNR Cert. No.: 999447130

Project Description: Nicor Newtson; Ottawa, IL.

CASE NARRATIVE

No analytical exceptions were noted outside of routine method protocols.

850 W. Bartlett Rd. / Bartlett, IL 60103-4400 / 630-289-3100 / Fax: 630-289-5445 / 800-378-5700

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KEY TO ABBREVIATIONS and METHOD REFERENCES

<	:	Less than; When appearing in the results column indicates the analyte was not detected at or above the reported value.
mg/L	:	Concentration in units of milligrams of analyte per liter of sample. Measurement used for aqueous samples. Can also be expressed as parts per million (ppm).
ug/g	:	Concentration in units of micrograms of analyte per gram of sample. Measurement used for non-aqueous samples. Can also be expressed as parts per million (ppm) or mg/Kg.
ug/L	:	Concentration in units of micrograms of analyte per liter of sample. Measurement used for aqueous samples. Can also be expressed as parts per billion (ppb).
ug/Kg	:	Concentration in units of micrograms of analyte per kilogram of sample. Measurement used for non-aqueous samples. Can also be expressed as parts per billion (ppb).
TCLP	:	These initials appearing in front of an analyte name indicate that the Toxicity Characteristic Leaching Procedure (TCLP) was performed for this test.
Surr:	:	These initials are the abbreviation for surrogate. Surrogates are compounds that are chemically similar to the compounds of interest. They are part of the method quality control requirements.
%	:	Percent; To convert ppm to %, divide the result by 10,000. To convert % to ppm, multiply the result by 10,000.
ICP	:	Indicates analysis was performed using Inductively Coupled Plasma Spectroscopy.
AA	:	Indicates analysis was performed using Atomic Absorption Spectroscopy.
GFAA	:	Indicates analysis was performed using Graphite Furnace Atomic Absorption Spectroscopy.
PQL	:	Practical Quantitation Limit; the lowest level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions.

Method References

(1) Methods 1000 through 9999: see "Test Methods for Evaluating Solid Waste", USEPA SW-846, 3rd Edition, 1986.

(2) ASTM "American Society for Testing Materials"

(3) Methods 100 through 499: see "Methods for Chemical Analysis of Water and Wastes", USEPA, 600/4-79-020, Rev. 1983.

(4) See "Standard Methods for the Examination of Water and Wastewater", 17th Ed, APHA, 1989.

(5) Methods 600 through 625: see "Guidelines Establishing Test Procedures for the Analysis of Pollutants", USEPA Federal Register Vol. 49 No. 209, October 1984.

(6) Methods 500 through 599: see "Methods for the Determination of Organic Compounds in Drinking Water," USEPA 600/4-88/039, Rev. 1988.

(7) See "Methods for the Determination of Metals in Environmental Samples", Supplement I EPA-600/R-94/111, May 1994.

(8) See "Standard Methods for the Examination of Water and Wastewater", 18th Ed., APHA, 1992.

(9) Methods 1000 through 9999: see "Test Methods for Evaluating Solid Waste", USEPA SW-846, 3rd Edition, 1986, Including Updates I and II.

(10) This method is from the 2nd Edition of "Test Methods for Evaluating Solid Waste", USEPA SW-846. It has been dropped from the 3rd Edition, 1986.

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HUFF & HUFF, INC.
Environmental Consultants

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Phone (708) 579-5940
Fax (708) 579-3526

March 3, 2001

John Watson, Esquire
Gardner, Carton & Douglas
321 North Clark, Suite 3400
Chicago, IL

Re: Nicor Gas–Newtson Scrap Metal

Dear John:

Enclosed please find a copy of the Draft Report on the mercury removal action at the Newtson Iron & Metal site. We will finalize this report upon receipt of your comments. We are also waiting on your comments on the Reporting Center Report, before finalizing this report. Our intent is to start on the DeKalb Iron & Metal Report next, which will be similar to the Newtson Report.

Sincerely;

James E. Huff. P.E.

bcc: Claudia Macholz, Nicor